

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

IN RE:)	
)	
WILLIAM CHARLES BEVAN,)	Case No. 22-12609-LSS
)	Chapter 7
Debtor.)	
)	

TRUSTEE’S MOTION FOR AUTHORITY TO MAKE AN INTERIM DISTRIBUTION

Janet M. Nesse, Trustee of the Chapter 7 estate of William Charles Bevan (the “Debtor”), by and through undersigned counsel, McNamee Hosea, et al., respectfully submits this Motion for Authority to Make an Interim Distribution, and states as follows:

1. This case was commenced on May 23, 2022, when the Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. The case was converted to a Chapter 7 case on June 16, 2023.
3. Among the assets of the bankruptcy estate were the real properties located at 3415 Wenona South, Laurel, Maryland 20724 (the “Laurel Property”), and 11229 Empire Lane, Rockville, Maryland 20852 (the “Rockville Property,” and together with the Laurel Property, the “Properties”).
4. The Trustee sold the Laurel Property on August 1, 2025, and sold the Rockville Property on August 2, 2025.
5. On August 29, 2025, the Trustee filed Reports of Sale related to the Properties (Docket Nos. 319 and 320).
6. The Trustee currently has \$455,060.98 in the bankruptcy estate’s account. See Form 2 attached hereto as Exhibit A.

7. On October 28, 2025, this Court entered an *Order Granting in Part and Denying in Part Debtor's Renewed Motion to Reconsider Objection to Exemption and to Direct Trustee to Disburse Exempt Property to Debtor* (Docket No. 612). The Order directed the Trustee to disburse to the Debtor the sum of \$16,221.93, representing funds exempt as identifiable retirement funds, and further authorized and directed the Trustee to file this Motion “to make an interim distribution to all allowed claims, except any claims for which the amounts are subject to dispute, including the administrative claims of John D. Burns and The Burns Law Firm and Adam Ross Levin, and to withhold sufficient funds in reserve to pay all disputed claims and estimated administrative expenses in full.”

8. Allowed unsecured claims total \$55,832.16. A list of allowed unsecured claims is attached hereto as Exhibit B.

9. John D. Burns and The Burns Law Firm have a pending fee application seeking fees of \$139,045.12 and reimbursement of expenses of \$5,086.47, totaling \$144,131.59 (Docket No. 354). Of that amount, \$23,115.95 is held in The Burns Law Firm's escrow account, leaving a potential administrative claim against the estate of \$121,015.64.

10. Adam Ross Levin has a pending fee application seeking compensation of \$36,800.00 and reimbursement of expenses of \$3,799.98, totaling \$40,599.98 (Docket No. 360), representing a potential administrative claim in that amount.

11. On December 12, 2023, the Court entered an Order awarding a pre-conversion administrative expense claim in the amount of \$18,790.50 to the Accountant, Edward A. Bortnick. Of this amount, \$7,500.00 was satisfied by a prepetition retainer, leaving a remaining administrative claim of \$11,290.50 owed by the estate. (Docket No. 396.)

12. In addition to the pre-conversion accountant administrative claim described above, the Trustee anticipates the need to employ an accountant and intends to reserve \$10,000.00 for administrative fees associated with such employment.

13. The attorney's fees and costs for the Trustee's counsel, together with the Trustee's statutory commission through October 31, 2025, total approximately \$125,000.00, and are expected to ultimately total no more than \$200,000.00. The Trustee is simultaneously filing an interim legal fee application and, if approved, proposes to pay \$40,000 as interim legal fees.

14. The Trustee anticipates that this case will remain open for some time, as the administrative fee applications of John D. Burns and The Burns Law Firm and of Adam Ross Levin are currently the subject of ongoing litigation.

15. Based on the current total of \$455,060.98 held in the bankruptcy estate's account, the Trustee believes that a 100% distribution can be made on all allowed unsecured claims and that sufficient funds will remain on hand to pay all disputed claims and estimated administrative expenses in full. See Exhibit C for the calculation of funds available for administrative claims after the proposed distribution.

16. The Trustee therefore seeks authority to make an interim distribution on all allowed unsecured claims totaling \$55,832.16.

17. The proposed distribution will also reduce bank service fees associated with maintaining the current balance in the estate's account.

WHEREFORE, the Trustee respectfully requests that this Court enter an Order:

- a. Authorizing the Trustee to make an interim distribution as outlined in this Motion;
- and
- b. Granting such other and further relief as the Court deems just and proper.

Dated: January 6, 2026

Respectfully submitted

/s/ Janet M. Nesse

Janet M. Nesse (Fed. Bar No. 07804)

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Counsel for the Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this January 6, 2026, a true and correct copy of the foregoing has been served via the CM/ECF system to all registered users of the CM/ECF system that have requested such notification in this proceeding, including:

- Donald L Bell donbellaw@gmail.com, admin@donbellaw.com; bell.donaldr125259@notify.bestcase.com
- John D. Burns info@burnsbankruptcyfirm.com, burnslaw3@gmail.com; burnslaw6@gmail.com; notices@nextchapterbk.com; pacerecfemails@gmail.com; 2634@notices.nextchapterbk.com
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I FURTHER CERTIFY that on this January 6, 2026, a true and correct copy of the *foregoing* has been served by first class mail, postage prepaid, to the parties listed below:

Office of the U.S. Trustee
6305 Ivy Lane, Suite 600
Greenbelt, MD 20770

William Bevan
351 Anderson Ave
Indiana, PA 15701

/s/ Janet M. Nesse
Janet M. Nesse